

K&H Kate Coin Programme – Privacy Notice

K&H Csoportszolgáltató Központ Kft. (registered seat: 1095 Budapest, Lechner Ödön fasor 9., Hungary; hereinafter: “**KHCSK**”), acting as **data controller**, hereby provides the following information on the processing of personal data in connection with the K&H Kate Coin programme available via the K&H Mobile Banking Application.

I. Purposes and Legal Bases of Processing

I.1 Provision of the K&H Kate Coin Programme

For the purpose of enabling participation in the Kate Coin Programme—including the display of **personalised offers**—KHCSK processes personal data, including data received from K&H Bank and K&H Insurance, partly on the basis of the **data subject’s explicit consent**.

KHCSK enters into a contract with customers for the provision of the Kate Coin Programme.

- **Legal basis:**
 - Article 6(1)(b) GDPR – performance of a contract
 - Article 6(1)(a) GDPR – consent (where applicable, e.g. for personalised offers based on additional data)
- **Retention period:**
 - Processing lasts for the duration of the contractual relationship
 - After termination:
 - General contractual claims: up to **5 years** (pursuant to applicable civil law limitation periods)
 - Accounting-related data: **8 years** following the transaction (in accordance with applicable accounting legislation)
- **Categories of personal data:**
 - Identification data (e.g. name, basic identifiers)
 - Contact details
 - Contractual data relating to products/services
 - Product and service usage data
 - Communication and interaction data

- Customer profile data (including data inferred through profiling)
- Transaction data (which may be considered sensitive from a business perspective)

Profiling

KHCSK performs **profiling** to personalise offers. This involves analysing data processed in connection with the Kate Coin Programme (including data provided on the basis of consent) and deriving conclusions (e.g. preferences, behaviour, interests) in order to present relevant products, services, and content tailored to the customer.

I.2 Logging for Troubleshooting purposes (Kate Coin Store)

KHCSK performs logging to ensure the **secure and uninterrupted operation** of the service.

- **Legal basis:**
Article 6(1)(f) GDPR – legitimate interests
 - **Legitimate interest:**
Ensuring service continuity, system security, and effective troubleshooting
 - **Retention period:**
For the duration of the contractual relationship
 - **Categories of personal data:**
 - Identification data
 - Contact details
 - Usage data
 - Communication and interaction data
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I.3 Complaint Handling

KHCSK processes personal data for the purpose of handling customer complaints related to the Kate Coin Programme.

- **Legal basis:**
Article 6(1)(c) GDPR – compliance with a legal obligation
- **Retention period:**
 - Duration of complaint handling

- Retained for **3 years** from the date of response, in accordance with applicable consumer protection regulations
 - **Categories of personal data:**
 - Identification data
 - Contact details
 - Contractual data
 - Usage data
 - Communication and interaction data
 - Customer profile data
 - Transaction data
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II. Data Transfers and Processors

KHCSK transfers personal data to the following **data processors** for the provision of the Kate Coin Programme:

II.1 Bloomreach B.V.

- **Registered office:**
Keizersgracht 125, 1015 CJ Amsterdam, Netherlands
 - **Activity:**
Provision, operation and support of the Bloomreach communication automation platform, including:
 - Sending and storage of messages
 - Management of customer, interaction, message, and device-related data
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II.2 KBC Global Services N.V.

- **Registered office:**
Havenlaan 2, 1080 Brussels, Belgium
- **Activity:**
IT development and operational support for the Kate Coin Store solution

The service involves infrastructure services provided via **Amazon Web Services (AWS)**.

- **International data transfers:**

Where personal data is transferred to third countries, KHCSK ensures appropriate safeguards, such as:

- Standard contractual clauses
- Data encryption (in transit and at rest)
- Access control measures
- Network and physical security
- Incident and breach management

Where applicable, transfers may rely on the **EU–US Data Privacy Framework**.

II.3 K&H Bank Zrt.

- **Registered office:**

1095 Budapest, Lechner Ödön fasor 9., Hungary

- **Activity:**

- Operation of the Kate Coin Store
 - Provision of IT infrastructure and system components
 - Enabling mobile banking functionalities required for the programme
 - Participation in personalised offer generation
 - Customer support and complaint handling
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III. Data Subject Rights

Data subjects have the following rights under the GDPR:

- Right of **access** (Article 15 GDPR)
 - Right to **rectification** (Article 16 GDPR)
 - Right to **erasure** (Article 17 GDPR)
 - Right to **restriction of processing** (Article 18 GDPR)
 - Right to **object** to processing (Article 21 GDPR)
 - Right to **withdraw consent** at any time (where processing is based on consent)
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IV. Further Information and Contact

For more detailed information on data processing, including contact details of KHCSK and its **Data Protection Officer (DPO)**, as well as available legal remedies, please refer to the General Privacy Notice available at:

 www.kh.hu/adatvedelem